

STATE OF MICHIGAN



JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

STEVENS T. MASON BUILDING
BOX 30028
LANSING, MI 48909

RONALD O. SKOOG, Director

March 28, 1986

US EPA RECORDS CENTER REGION 5



494216

NATURAL RESOURCES COMMISSION

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STEPHEN F. MONSMA
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RAYMOND POUPORE
HARRY H. WHITELEY

Mr. Steven E. Kurmas, P.E., Manager
Engineering Design & Construction Planning
Michigan Consolidated Gas Company
500 Griswold Street
Detroit, Michigan 48226

Dear Mr. Kurmas:

Site investigation reports for Michigan Consolidated Gas Company's coal gasification sites have been reviewed by the Michigan Department of Natural Resources (MDNR) staff.

The reports are not technically acceptable. The reports are deficient in the methodology used to determine the extent and type of contamination at the sites. Furthermore, the conclusions reached in the reports are not supported by data. Due to the deficiencies found in the reports, the Greenville and Riverside studies cannot be accepted, nor serve as "models" for other sites you have in Michigan.

The Department's goal is to protect the public health and Michigan's natural resources from present and/or future impacts posed by the contaminants at each of the Michigan Consolidated sites. The remedial action plans proposed by Michigan Consolidated do not, in our opinion, protect public health or the environment. We, therefore, request that Michigan Consolidated complete the following:

1. Identify each location in Michigan that Michigan Consolidated Gas Company now owns or owned in the past at which coal gasification operations took place. If Michigan Consolidated does not now own one or more of the sites, to whom did Michigan Consolidated sell or transfer ownership of the site(s) property.
2. Conduct thorough hydrogeological evaluations to determine the vertical and horizontal extent of soil and groundwater contamination at each of the Michigan Consolidated sites.
3. Submit the reports generated from the hydrogeological investigations and site identification effort to the MDNR for review and approval.



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4. Based on the hydrogeological studies submitted under item number 2, submit work plans that address appropriate remedial action for each site to MDNR for review and approval.

The consent agreement proposed by Michigan Consolidated for the Riverview site has been reviewed by MDNR technical and enforcement staff. The agreement is completely unacceptable to us.

I have asked MDNR staff to meet with you to determine if we can resolve the problems at these sites without formal enforcement action. We have, therefore, scheduled a meeting for April 10, 1986, in the 1st floor, N.E. Secretary of State Conference Room, Treasury Building, Lansing, Michigan at 10:00 a.m.

Please contact Wanda Neal at 517-373-2794, or John Shauver at 517-373-3503 if you have any questions or need any further information before the meeting.

Sincerely,

Richard S. Johns

Richard S. Johns, Chief
Groundwater Quality Division
517-373-1947

Richard Noder ACTING

Donald Inman, Chief
Environmental Enforcement Division
517-373-3503

cc: Mr. Doug Donnell, Attorney
Mr. Thomas O. Work, Compliance #1, GQD
Mr. David Dennis, Compliance #2, GQD